Exhibit D

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January 9, 2002

VIA FEDERAL EXPRESS DELIVERY

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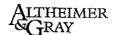
Re: Vanguard ID Systems, Inc. v. Stik/Strip Laminating, No. 97-6790

Dear David:

On December 11, 2001, all responsive documents to the subpoenas were made available for your review. In total, I believe we produced approximately 11 boxes of documents. However, after receiving your letter of December 17, 2001, both this firm and our client rereviewed all relevant files to see if we had inadvertently failed to make certain documents available. We can categorically affirm at this time that our original production, corroborated by the re-review, was exhaustive. We believe you have seen every document in our possession responsive to your subpoenas.

We did locate one additional work file which we believe contained duplicates of responsive documents previously made available to you. Even though these documents were likely contained in the 11 boxes made available to you, out of an abundance of caution, we enclose them for your review.

Dave, as I am sure you understand, not long after DocuSystems, Inc. and the banks entered into the Seventh Forbearance Agreement, the company again defaulted on its obligations and a "fire sale" process of selling off the last remaining businesses occurred. As you also know, the banking group was really in control of the process at that point, as the debt of the company to the banks at the time of the foreclosure sale was in excess of \$54 million. Thus, even though we are sympathetic to "your belief" that there must be additional documents, if any such documents did exist, they are no longer in our possession. Thus, there is nothing more we can do to assist in your attempt to collect on the \$2 million judgment.



David J. Perlman, Esq. January 9, 2002 Page 2

Finally, late last night, after this letter had been written, I received your letter of January 8, 2002. Given the representations made above, I fail to see what matter can be taken up with the Court. However, I would be happy to discuss the matter further if you so desire.

Sincerely,

John F. Gibbons

For ALTHEIMER & GRAY

Enclosures

ce: Thomas C. McDonough

Bryan K. Koontz, Jr. Steven R. Brown